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April 11C, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 03-11 - Application by Qwest
Communications International Inc. for Authority to
Provide In-Region InterLATA Services in New Mexico,
Oregon and South Dakota**

Dear Ms. Dortch:

This letter is being submitted by Qwest Communications International Inc. ("Qwest") at the request of the Wireline Competition Bureau in order to address provisioning and controls related to long distance service. Notwithstanding that a television commercial promoting Qwest's long distance service ran in certain markets in Arizona, Minnesota, New Mexico and Oregon on April 7, 2003 (and during the early morning hours in one market on April 8, 2003), this will confirm that Qwest has not provisioned long distance service to any customers in any state in which it does not have Section 271 authority. Qwest has in place controls specifically designed to prevent the provisioning of long distance service in its five unapproved states.

First, controls were built into all order entry applications associated with LD service that are designed to prevent orders from being taken in unapproved states. The controls are designed so that long distance USOCs and the PICs and LPICs for Qwest's Section 272 affiliates are frozen in Qwest's systems until an order authorizing Qwest to provide long distance in that state is effective.¹ The activation of Qwest Information Technologies' ("IT") systems to allow for launching a newly approved state does not begin until the actual day the service will be launched. On the morning of launch, the IT Command Center communicates with all impacted

¹ A separate system and a similar set of controls prevent 8xx service orders from being processed prior to state specific long distance authority becoming effective.

areas to begin changing their control tables to allow long distance orders to be taken. These same controls that are in place for order entry applications are also in place for the billing and provisioning systems further assuring that long distance service cannot be activated in the switch.

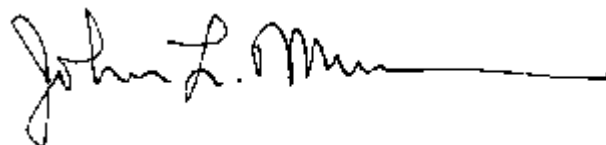
Furthermore, Qwest IT has developed a "Pending Long Distance Orders Report" which displays all pending long distance orders. The report is designed to identify orders that are pending in the system prior to service being provisioned. The report is generated and reviewed daily by an IT project manager for any potential orders taken in unapproved states. If an order from an unapproved state appears on this report, the order is investigated by IT to assure that it is not processed for an unapproved state. Qwest also has a network PIC team that processes long distance orders daily, reviews the list of orders for any states that are not yet approved, and stands ready to prevent them from continuing in the process to receive service.

Additionally, Qwest has trained its sales and customer care consultants in the requirements of Section 272. They have been trained not to accept orders for long distance service from unapproved states. The training was both web-based and live face-to-face training that occurred in 2002 and 2003. The training required the participants to display an understanding of the material by testing their comprehension. Additionally, special certification training classes were held for subject matter experts and the leadership of these sales teams. Training was also developed and implemented for all vendors providing telemarketing services on behalf of Qwest.

Qwest has in place effective end-to-end controls at the order processing, billing, and provisioning levels designed to prevent customers in unapproved states from receiving long distance services from Qwest. Additionally, Qwest has trained its sales and customer care consultants on the requirements of Section 272 and the prohibition on serving customers in unapproved states.

The twenty-page limit does not apply to this submission.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John L. Munn", followed by a long horizontal line extending to the right.

John L. Munn

cc: K. Cook
W. Dever
G. Remondino

Marlene Dortch

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